

MJL:BTR  
F.#2005R00022  
OCDETF-NYE476

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ SEP 28 2006 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

- - - - - X

UNITED STATES OF AMERICA

- against -

PETER ZUCCARO,  
also known as "Bud,"  
VINCENT SAPORITO,  
PASQUALE J. ANDRIANO,  
ANGELO S. RUGGIERO, and  
RICHARD BROWNRIGG,

Defendants.

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THE GRAND JURY CHARGES:

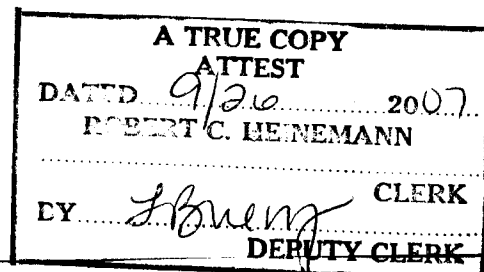
COUNT ONE

(Conspiracy to Distribute and Possess  
with the Intent to Distribute Marihuana)

1. In or about and between January 1997 and March 3, 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants PETER ZUCCARO, also known as "Bud," VINCENT SAPORITO, PASQUALE J. ANDRIANO, ANGELO S. RUGGIERO, and RICHARD BROWNRIGG, together with others, did knowingly and intentionally conspire (a) to distribute and to possess with intent to distribute a controlled substance, which offense involved one thousand or more marihuana plants and one thousand kilograms or more of a substance containing marihuana, a Schedule I controlled substance, and (b)

S U P E R S E D I N G  
I N D I C T M E N T

Cr. No. 05-196(S-6)(SJF)  
(T. 18, U.S.C., §§  
982(a)(1), 982(b)(1),  
1956(h) and 3551 et seq.;  
T. 21, U.S.C., §§  
841(b)(1)(A)(vii),  
846, 853 and 860(a))



to distribute and possess with intent to distribute such controlled substance within 1,000 feet of the real property comprising an elementary school, to wit: P.S. 109, 1001 East 45<sup>th</sup> Street, Brooklyn, New York and Saint Robert Bellarmine School, 56-10 214th Street, Bayside, New York, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(vii) and 860(a); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Conspiracy to Launder Money)

2. On or about and between January 1, 1997 and March 3, 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants PETER ZUCCARO, also known as "Bud," VINCENT SAPORITO, PASQUALE J. ANDRIANO, and ANGELO S. RUGGIERO, together with others, did knowingly and intentionally conspire to conduct financial transactions affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, to wit: marihuana trafficking, in violation of Title 21, United States Code, Section 841(a), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity (a) with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing

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that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendants charged in Count One that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including but not limited to, the following:

Money Judgment

A sum of money equal to \$12,000,000.00 in United States currency, for which the defendants are jointly and severally liable.

Specific Property

a. All right, title and interest in the real property

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and premises located at 1041 East 46<sup>th</sup> Street, Brooklyn, New York;

b. All right, title and interest in the real property and premises located at 1510-1514 Schenectady Avenue, Brooklyn, New York;

c. All right, title, and interest in the assets of Collocated, Inc.;

d. All right, title and interest in the real property and premises located at 1755 Dingle Hill Road, Andes, New York;

e. All right, title, and interest in the assets of Al Precise, Inc.;

f. All right, title and interest of the defendants in 8706 101st Avenue, Jamaica, New York 11416, Parcel Number: 0908700013;

g. All right, title and interest of the defendants in 347 Marinette Street, Douglaston Manor, New York 11363; and

h. All right, title and interest of the defendants in Scrap Metal Corp. d/b/a Heavy Auto Crushers #1 and Heavy Auto Crushers #2.

4. If any of the above-described forfeitable property, as a result of any act or omission of any defendant,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

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c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property, which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, including, but not limited to, the real property and premises located at 12557 Equine Lane, Wellington, Florida 33414-3507, up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Section 853)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

5. The United States hereby gives notice to the defendants charged in Count Two that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), of all property involved in the conspiracy to violate Title 18, United States Code, Section 1956, and all property traceable to such property as a result of the defendants' conviction of Count Two, including but not limited to, the following:

Money Judgment

A sum of money equal to \$12,000,000.00 in United States currency, for which the defendants are jointly and severally liable.

Specific Property

a. All right, title and interest in the real property and premises located at 1041 East 46<sup>th</sup> Street, Brooklyn, New York;

b. All right, title and interest in the real property and premises located at 1510-1514 Schenectady Avenue, Brooklyn, New York;

c. All right, title, and interest in the assets of Collocated, Inc.;

d. All right, title and interest in the real property and premises located at 1755 Dingle Hill Road, Andes, New York;

e. All right, title, and interest in the assets of Al Precise, Inc.;

f. All right, title and interest of the defendants in 8706 101st Avenue, Jamaica, New York 11416, Parcel Number: 0908700013;

g. All right, title and interest of the defendants in 347 Marinette Street, Douglaston Manor, New York 11363; and

h. All right, title and interest of the defendants in Scrap Metal Corp. d/b/a Heavy Auto Crushers #1 and Heavy Auto Crushers #2.

6. If any of the above-described forfeitable property, as a result of any act or omission of any defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with,  
a third party;

c. has been placed beyond the jurisdiction of the  
Court;

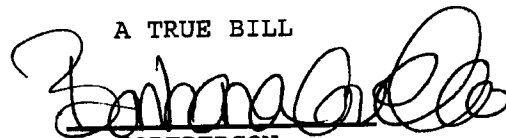
d. has been substantially diminished in value; or

e. has been commingled with other property, which  
cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21,  
United States Code, Section 853(p), as incorporated by Title 18,  
United States Code, Section 982(b)(1), to seek forfeiture of any  
other property of the defendants, including, but not limited to,  
the real property and premises located at 12557 Equine Lane,  
Wellington, Florida 33414-3507, up to the value of the  
forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and  
982(b)(1))

A TRUE BILL



FOREPERSON



ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK